In the Drawings:

The attached sheets of drawings include changes to Figure 5 and changes to Figure 7. The sheet containing Figure 5 replaces the original sheet including Figure 5. The sheet containing Figure 7 replaces the original sheet including Figure 7. Figure 5 has been amended to change block 570 and add blocks 575, 580, 585, 590, and 595. Figure 7 has been amended to replace Primary and Localization Tables 765 with Primary Table 765 and Localization Tables 775.

Attachment: Replacement Sheets

REMARKS

Claims 2-4, 8, 12, 14, 18, and 21-28 have been amended. Claims 1-28 remain pending in the application. Reconsideration is respectfully requested in view of the following remarks.

Objection to the Drawings:

The Examiner objected to Figure 5 and Figure 7 for failing to include various reference numerals mentioned in the description. Figure 5 has been amended to change block 570 and add blocks 575, 580, 585, 590, and 595. Figure 7 has been amended to replace Primary and Localization Tables 765 with Primary Table 765 and Localization Tables 775. No new matter has been added.

Section 101 Rejection:

The Examiner rejected claims 21-28 under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Applicants traverse this rejection. However, to expedite prosecution, Applicants have amended claims 21-28 to recite, in pertinent part, a "computer-readable storage medium." Removal of the section 101 rejection is respectfully requested.

Section 112, Second Paragraph, Rejection:

The Examiner rejected claims 2-5, 8, 12, 14, 18, 23, 25, 26 and 27 under 35 U.S.C. § 112, second paragraph as indefinite. Applicants traverse this rejection for at least the following reasons.

The Examiner argued that the limitation "the computer" in claims 3, 8, 12, 16, 17, 19, 20, 21, 25, 26, 27, and 29 lacked sufficient antecedent basis. However, Applicants

note that claims 3, 8, 12, 16, 17, 19, 20, 21, 25, 26 and 27 do not recite the limitation "the computer" and further note that no claim 29 is pending.

The Examiner argued that the limitation "the application component logic" in claims 2, 3, 4, and 25 lacked sufficient antecedent basis. Applicant has amended claims 2, 3, 4, and 25 to clarify the antecedent basis.

The Examiner argued that the limitation "the data" in claim 5 lacks sufficient antecedent basis. Applicant respectfully submits that proper antecedent basis for "the data" is found in the limitation "data stored in one or more localization database tables" recited earlier in claim 5.

The Examiner argued that the limitation "the execution" in claim 12 lacks sufficient antecedent basis. Applicant has amended claim 12 to recite "execution of the method" instead of "the execution of the method."

The Examiner argued that the limitation "the system default locale and translatable table information" in claims 18 and 27 lacks sufficient antecedent basis. Applicant has amended claims 18 and 27 to recite "a system default locale" instead of "the system default locale."

The Examiner argued that the limitation "the localization logic" in claim 26 lacks sufficient antecedent basis. Applicant has amended claim 26 to recite "localization logic" instead of "the localization logic."

The Examiner argued that claims 8, 14, and 23 are indefinite due to their recitation of the trademark/trade name "Java." Applicant has amended claims 8, 14, and 23 to remove the term "Java."

Accordingly, removal of the section 112, second paragraph rejection is respectfully requested.

Section 102(b) Rejection:

The Examiner rejected claims 1-28 under 35 U.S.C. § 102(b) as being anticipated by Granade et al. (U.S. Publication 2002/0103881) (hereinafter "Granade"). Applicants respectfully traverse this rejection for at least the reasons below.

Regarding claim 1, Granade fails to teach or suggest interception logic configured to intercept a plurality of method calls to the application component, **wherein the interception logic is configured to invoke the localization logic in response to one or more of the plurality of method calls**. At paragraph 0042, Granade discloses an integration manager that intercepts requests for applications:

> Integration manager 202 tracks specific applications available in backend systems 102 and the corresponding methods registered for accessing these systems stored in application repository 116. Integration manager 202 intercepts requests for applications in backend systems 102 while an appropriate method or methods are identified for execution. Integration manager 202 receives requests in an intermediary language such as XML and then invokes a method in a language or format appropriate for the particular application on backend systems 102. In certain cases, integration manager 202 can also be used to ensures proper XML code is generated and used during data processing. Languages, interface protocols and syntaxes supported by integration manager 202 are compatible with XML, SQL, HTML, LDAP, CORBA, COM, and IIOP. For example, integration manager can be implemented using a hash table that maps applications and functions offered by the applications to specific methods developed in the appropriate language and interface protocol. Accordingly, a Microsoft application like Outlook may be accessed using a method written in COM while an object-oriented CRM application written in Java may be accessed using CORBA compatible methods.

Although Granade's integration manager invokes a method "in a language or format appropriate for the particular application," this language or format is one of several software-related languages and standards (e.g., "languages, interface protocols and syntaxes … compatible with XML, SQL, HTML, LDAP, CORBA, COM, and IIOP") and is not related to Granade's localization component. Further regarding Granade's localization component, Applicants can find no teaching or suggestion in

Granade (e.g., in paragraphs 0031, 0037, and 0038) that the localization component is invoked by interception logic <u>in response to</u> one or more of a plurality of method calls to the application component.

Applicants remind the Examiner that anticipation requires the presence in a single prior art reference disclosure of <u>each and every limitation</u> of the claimed invention, <u>arranged as in the claim</u>. M.P.E.P 2131; *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984). The <u>identical</u> invention must be shown <u>in as complete detail</u> as is contained in the claims. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). As discussed above, Granade fails to disclose interception logic configured to intercept a plurality of method calls to the application component, wherein the interception logic is configured to invoke the localization logic in response to one or more of the plurality of method calls. Therefore, Granade clearly cannot be said to anticipate claim 1.

Regarding claim 11, Granade fails to teach or suggest a method comprising <u>creating a dynamic proxy for an application component</u> comprising one or more localizable parameters or return values. In rejecting claim 11, the Examiner relies upon Granade's teachings in Figure 6 and paragraphs 0060 and 0061. At the cited locations, Granade discloses executing an application to generate data, converting the data to a target format, and rendering the data on a mobile device. However, Applicants can find no teaching or suggestion in Granade for any method comprising <u>creating a dynamic proxy for an application component</u>. Similarly, Granade fails to teach or suggest a method comprising <u>modifying a service locator to return an interface to the proxy</u> or <u>the dynamic proxy invoking localization logic, separate from application logic</u>, to translate localizable parameters or return values between a system default locale to another locale.

Regarding claim 12, Granade fails to teach or suggest a method comprising determining whether input parameters or return values associated with the method call are localizable. In rejecting claim 12, the Examiner relies upon Granade's teachings in Figure 7 and paragraphs 0063 through 0065. At the cited locations, Granade discloses

techniques for delivering information from a mobile device to a backend system (including an application). The information sent to the application is enhanced with application services including localization services. However, Applicants can find no teaching or suggestion in Granade for <u>determining whether</u> input parameters or return values associated with the method call are localizable. By disclosing in paragraph 0038 that localization services are <u>automatically</u> performed, rather than by determining whether input parameters or return values associated with the method call are localizable, Granade appears to <u>teach away</u> from claim 12.

Thus, for at least the reasons above, the rejection of independent claims 1, 11, and 12 is not supported by the cited art, and removal thereof is respectfully requested. Similar remarks also apply to independent claims 20 and 21.

Regarding claim 9, Granade fails to teach or suggest a method wherein the localization logic is configured to invoke localization functions <u>before and after</u> the execution of the method. In rejecting claim 9, the Examiner relies upon Granade's teachings in Figure 2 and paragraph 0038. At the cited locations and elsewhere in Granade, Applicants can find no teaching or suggestion that localization functions are invoked before the execution of the method <u>and</u> after the execution of the method. To the contrary, Granade suggests in paragraph 0037 that localization functions are performed <u>in the application itself</u> (by selection of a locale variable in the application for generating information) and are therefore not performed before <u>or</u> after execution. Therefore, Granade clearly cannot be said to anticipate claim 9.

Applicant also asserts that numerous other ones of the dependent claims recite further distinctions over the cited art. However, since the rejection has been shown to be unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time.

CONCLUSION

Applicants submit the application is in condition for allowance, and prompt notice to that effect is respectfully requested.

If any extension of time (under 37 C.F.R. § 1.136) is necessary to prevent the above-referenced application from becoming abandoned, Applicants hereby petition for such an extension. If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-64700/RCK.

Also enclosed herewith are the following items:

☐ Return Receipt Postcard

☐ Petition for Extension of Time

☐ Notice of Change of Address

☒ Replacement Drawing Sheets

Respectfully submitted,

/Robert C. Kowert/
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